

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

UNITED STATES OF AMERICA

CASE NO. 1:15-CR-107

Plaintiff,

HONORABLE JUDGE BLACK

vs.

NICHOLAS KURTZ

MOTION FOR BOND

Defendant.

Now comes Defendant, **NICHOLAS KURTZ**, by and through Counsel, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court to issue an Order granting bond pursuant to 18 U.S.C. § 3142.

A Memorandum in Support is attached hereto.

Respectfully submitted,

/s/ Jon Paul Rion _____
JON PAUL RION (#0067020)
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the Office of the United States Attorney on the same day of filing.

/s/ Jon Paul Rion

JON PAUL RION (#0067020)

RION, RION & RION, L.P.A., INC.

MEMORANDUM IN SUPPORT

On October 7, 2015, Nicholas Kurtz was indicted for Coercion and Enticement in violation of 18 U.S.C. § 2422(a) and 18 U.S.C. § 2422(b). Since Mr. Kurtz's indictment, he has spent over seven years in incarceration. During that time, he has exhibited good behavior, and this office is not aware of any disciplinary problems.

Mr. Kurtz is 28 years old and has had no adult criminal record. The original charges that Mr. Kurtz was indicted on have been substantially reduced and a disposition has been agreed upon. Mr. Kurtz is not a flight risk, as his family reside in the area.

Upon release, Mr. Kurtz will live at 993 Pekin Road, Lebanon, Ohio 45036. Mr. Kurtz parents, Russ and Barbara Kurtz, reside at the adjoining property 1291 Vicki Lane, Lebanon, Ohio 45036. Russ is a retired US Air Force Colonel.

Wherefore, Nicholas Kurtz respectfully requests that bond be set in the matter and he be released on electronic monitoring. In the event that Mr. Kurtz is released and able to obtain employment that is verifiable through pretrial services, that he be allowed to have work release.

/s/ Jon Paul Rion
JON PAUL RION (#0067020)
RION, RION & RION, L.P.A., INC.